

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2018-202-E**

IN RE: Petition of Duke Energy Carolinas, LLC	)	
and Duke Energy Progress, LLC for	)	
Approval of CRPE Queue Number	)	
Proposal, Limited Waiver of Generator	)	
Interconnection Procedures, and Request	)	
for Expedited Review	)	

**PETITION  
TO  
INTERVENE**

**INTRODUCTION**

This Docket was opened upon the June 19, 2018 correspondence of counsel for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, (hereinafter together as, “Duke”). This Commission established Commission Docket 2018-202-E, on June 19, 2018. Duke sought approval from this Commission related to the processing of Interconnection Requests for Interconnection Customers that elect to participate in the upcoming Competitive Procurement of Renewable Energy Program (“CPRE Program”), a limited waiver of certain provisions of the South Carolina Generator Interconnection Procedures, and an expedited review of its request.

Petitioner herein is Ecoplexus, Inc., (hereinafter as, “Ecoplexus” or “Petitioner”). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

**PETITIONER**

**Ecoplexus, Inc.**

1. Ecoplexus is a Delaware Corporation, domesticated by the South Carolina Secretary of State's Office to conduct business in South Carolina. Ecoplexus maintains an office at 807 East Main Street, Suite 6-050 Durham, North Carolina 27701 in addition to locations in San Francisco and Dallas.

2. Ecoplexus is a leader in the development, design, engineering, construction, financing, operations and ownership of renewable energy systems for the commercial, government and utility markets. Ecoplexus develops, builds, owns and operates clean energy projects and has completed, or has in construction, over 370 megawatts of utility-scale renewable generation facilities in North America.

**PETITION TO INTERVENE**

3. Ecoplexus is financially impacted by this Commission's approval process for Duke's Petition, as is outlined in more detail hereinbelow.

4. Specifically, Ecoplexus is a developer of renewable energy projects in South Carolina in Duke's assigned territory. Ecoplexus intends to participate in the CPRE Program. As such, Petitioner has a clear, direct, and substantial interest in the subject matter of this Docket.

5. Specifically, Ecoplexus will be directly impacted by Duke's proposed CPRE queue number proposal and the proposed waiver of certain Interconnection Procedures. Petitioner's interests cannot be adequately addressed by any other party. Therefore, the decision of this Commission is important to the Petitioner from a financial and a business standpoint.

6. Petitioner's Intervention will aid this Commission by assisting in the development of a full and fair record to address the important approval process to be conducted in this Docket. As shown above, Petitioner has a direct and material interest in this Commission's approval process and Petitioner's interests are not adequately represented by the current parties in this Docket.

7. Petitioner should be allowed to intervene in this Docket with full rights of cross-examination, discovery and participation in any Hearing to be scheduled in this Docket.

8. This Petition to Intervene is timely filed with this Commission.

9. The granting of Ecoplexus' Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it, and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

10. Ecoplexus is represented by counsel in this proceeding:

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### **CONCLUSION**

**WHEREFORE**, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,

/s/

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July 19, 2018  
Columbia, South Carolina